

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
RAFEE WALTERS	:	VIOLATIONS:
JAVIER WATSON	:	18 U.S.C. § 371 (conspiracy to commit
DOUGLAS TUCKER	:	armed bank robbery - 1 count)
IAN THOMAS	:	18 U.S.C. § 2113(d) (armed bank robbery
	:	- 1 count)
	:	18 U.S.C. § 924(c)(1)(A) (using and
	:	carrying a firearm during and in relation
	:	to a crime of violence - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, Wachovia Bank (“the bank”), located at 7157 Frankford Avenue, Philadelphia, Pennsylvania, was insured by the Federal Insurance Deposit Corporation.

2. On or about September 10, 2007, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**RAFEE WALTERS,
JAVIER WATSON,
DOUGLAS TUCKER, and
IAN THOMAS**

knowingly and intentionally conspired and agreed with each other to commit an offense against the United States, that is, to knowingly and unlawfully commit armed bank robbery, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

It was part of the conspiracy that:

1. Defendants RAFEE WALTERS, JAVIER WATSON, DOUGLAS TUCKER, and IAN THOMAS planned and executed the gunpoint robbery of the bank and agreed to flee if confronted by the authorities.

2. Defendant JAVIER WATSON secured the use of a red colored Buick, which defendant DOUGLAS TUCKER agreed to drive to and from the bank. Defendants TUCKER and IAN THOMAS agreed to wait in the car while defendants RAFEE WALTERS and WATSON robbed the bank.

3. Defendants RAFEE WALTERS, JAVIER WATSON, and IAN THOMAS secured items, that is, Rastafarian wigs and sunglasses, in order to disguise the identities of defendants WALTERS and WATSON and to prevent witnesses from identifying them.

4. Defendant RAFEE WALTERS secured the use of a firearm, to be brandished and used in order to steal money from the bank.

5. Defendants JAVIER WATSON, RAFEE WALTERS, DOUGLAS TUCKER, and IAN THOMAS agreed to share the proceeds of the armed bank robbery.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, defendants RAFEE WALTERS, JAVIER WATSON, DOUGLAS TUCKER, and IAN THOMAS committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. In or about early September, 2007, defendants JAVIER WATSON and RAFEE WALTERS agreed to commit armed robbery.

2. On or about September 8, 2007, defendant DOUGLAS TUCKER agreed with defendants JAVIER WATSON and RAFEE WALTERS to commit armed bank robbery.

On or about September 10, 2007:

3. Defendants JAVIER WATSON, RAFEE WALTERS, DOUGLAS TUCKER, and IAN THOMAS communicated with one another in person and over the telephone about plans to commit the bank robbery.

4. Defendant IAN THOMAS agreed with defendants JAVIER WATSON and RAFEE WALTERS to commit armed bank robbery.

5. Defendants JAVIER WATSON, RAFEE WALTERS, DOUGLAS TUCKER, and IAN THOMAS met at the home of defendant WALTERS.

6. Defendants JAVIER WATSON, RAFEE WALTERS, DOUGLAS TUCKER and IAN THOMAS rode together in a red-colored Buick, which was registered to the sister of JAVIER WATSON. Defendants WATSON, WALTERS, TUCKER, and THOMAS possessed one .45 caliber Taurus handgun ("the firearm") with ammunition and an obliterated serial number.

7. Defendants JAVIER WATSON and RAFEE WALTERS had two Rastafarian wigs and one pair of sunglasses in order to disguise their identities and to prevent witnesses from identifying them. Prior to the bank robbery, defendant IAN THOMAS purchased an additional pair of sunglasses for defendants WALTERS and WATSON to use in the commission of the armed bank robbery.

8. Immediately prior to the bank robbery, defendants RAFEE WALTERS and JAVIER WATSON each donned Rastafarian wigs and sunglasses and entered the bank.

9. Defendants RAFEE WALTERS and JAVIER WATSON used, carried, and brandished the firearm upon entering the bank.

10. Defendants RAFEE WALTERS and JAVIER WATSON ordered the employees and customers in the bank to the ground and ordered the employees to place money in two plastic bags. While holding the bank employees and customers at gunpoint, defendants WALTERS and WATSON stole approximately \$13,257 in U.S. currency from the bank and a purse belonging to a bank customer.

11. While defendants RAFEE WALTERS and JAVIER WATSON robbed the bank, defendants DOUGLAS TUCKER and IAN THOMAS waited near the bank in the front seats of the Buick for approximately four minutes.

12. Defendants RAFEE WALTERS and JAVIER WATSON exited the bank with the stolen money and purse and removed their disguises.

13. Defendants RAFEE WALTERS, JAVIER WATSON, DOUGLAS TUCKER and IAN THOMAS fled the scene of the armed bank robbery in the Buick. Defendants

WATSON and WALTERS gave defendant TUCKER instructions on where to drive and which traffic laws to disobey.

14. Defendants RAFEE WALTERS, JAVIER WATSON, DOUGLAS TUCKER and IAN THOMAS fled from the police during a high speed car pursuit.

15. After the car pursuit ended in a collision, defendants RAFEE WALTERS, JAVIER WATSON, DOUGLAS TUCKER and IAN THOMAS continued to flee from police on foot. During his flight, defendant THOMAS removed his shirt in order to prevent witnesses from identifying him.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 10, 2007, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**RAFEE WALTERS,
JAVIER WATSON,
DOUGLAS TUCKER, and
IAN THOMAS**

knowingly and unlawfully, by force and violence, and by intimidation, took and aided and abetted the taking of, from employees of the Wachovia Bank, 7157 Frankford Avenue, Philadelphia, Pennsylvania, and aided and abetted the forceful taking of, lawful currency of the United States, that is, approximately \$13,257, belonging to, and in the care, custody, control, and management and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and in so doing, the defendants knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Wachovia Bank and other persons, and did aid and abet the same, by use of a dangerous weapon, that is, a .45 caliber Taurus handgun.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 10, 2007, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**RAFEE WALTERS,
JAVIER WATSON,
DOUGLAS TUCKER, and
IAN THOMAS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a .45 caliber Taurus handgun, with an obliterated serial number, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit armed bank robbery as charged in Count One of this indictment, and armed bank robbery as charged in Count Two of this indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 371, 2113(d), 924(c)(1)(A), and 2, set forth in this indictment, defendants

**RAFEE WALTERS,
JAVIER WATSON,
DOUGLAS TUCKER, and
IAN THOMAS**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of such offense, including, but not limited to:

One .45 caliber Taurus handgun, silver and black in color, with an obliterated serial number; and

One magazine with nine rounds of .45 caliber ammunition

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**